



U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101

APR 20 1988

WA 2302 32

4/20/1988

REPLY TO  
ATTN OF:

HW-112

Registered Mail - Return Receipt Requested

Gary Podradsky  
Rhone-Poulenc, Inc.  
PO Box 80963  
Seattle, Washington 98108

Re: Environmental Protection Agency I.D. No. WAD009282302

Dear Mr. Podradsky:

Your firm submitted a Part A permit as a treatment or storage facility under the provisions of The Resource Conservation and Recovery Act (RCRA). Congress amended RCRA in 1984 requiring that final permits (Part B permits) for treatment and/or storage facilities (TSF's) be issued by November 8, 1992. To ensure that this objective is met, Congress required all TSF's to submit a Part B permit application by November 8, 1988. Failure to do so will automatically result in the loss of your ability to continue to operate the hazardous waste treatment or storage part of your business beyond November 8, 1992. However, failure to submit an application by November 8, 1988, does not prevent you from continuing to operate until November 8, 1992, under the interim status rules you have been operating under since you submitted your Part A.

You may elect to discontinue treating and storing hazardous waste before November 8, 1992. If that is the case, you are not obligated to submit a Part B permit application by November 8, 1988. Regardless of your decision on continued operation, you must submit the information requested in Enclosure A. After receipt of that information, you will be contacted to address any past practices that require corrective action and to address closure (decontamination) of the hazardous waste treatment or storage portion of your operation.

If you wish to continue hazardous waste management activities beyond November 8, 1992, you must submit a Part B application by November 8, 1988, and the application must be accompanied by the information requested in Enclosure A. Instructions for supplying this mandatory information are contained in Enclosure B. If you are uncertain as to your future need or desire to treat or store hazardous waste beyond November 8, 1992, you should protect your right to do so by submitting your application and the requested information by November 8, 1988.

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The information in Enclosure A is being requested under the authority of Section 3007 of RCRA, and is to be submitted within 30 days of receipt of this letter.

We are requesting that you notify us within 30 days as to whether you will be submitting a Part B application prior to November 8, 1988, or will be choosing to discontinue hazardous waste operation prior to November 8, 1992. You are not bound by this notice as your response is for information purposes only. However, if you desire to develop a permit application you may request guidance material at the time of notice.

Because we expect to receive more applications than we will have resources to handle, the applications will be processed utilizing a priority scheme. This scheme will be based on factors such as environmental significance, desire to continue to operate, type of operation, and capacity, among others.


This letter is intended to advise you of the requirement to submit a Part B application by November 8, 1988, if you desire to continue your hazardous waste treatment and/or storage activity beyond November 8, 1992. We are advising you now so that you have at least the minimum preparation time of six months required by the regulations. The final permit application should be submitted to both agencies. The mailing addresses can be found in Enclosure B. If you have any questions, please contact Mr. Wallace Reid, EPA, at (206) 442-5171.

Sincerely,



Marc Horton, Deputy Director  
Operations and Enforcement  
Department of Ecology

Sincerely,



Charles E. Findley, Director  
Hazardous Waste Division  
Environmental Protection Agency

Enclosures

cc: Karen Michelena, Ecology